

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

JOHN A. SPERTUS, MD

Plaintiff,

v.

EPIC SYSTEMS CORPORATION,

Defendant.

Case No. 4:22-cv-183

**DECLARATION OF JAMIE BJORKLUND IN SUPPORT OF DEFENDANT
EPIC SYSTEMS CORPORATION'S MOTION TO DISMISS OR TRANSFER**

I, Jamie Bjorklund, declare:

1. I work in the Human Resources department at Epic Systems Corporation ("Epic") in Verona, Wisconsin.

2. I understand that Epic has been named as the defendant in a lawsuit alleging copyright infringement related to Epic's electronic health records software. I submit this declaration in support of Epic's Motion to Dismiss or Transfer. Through my position with Epic, I have personal knowledge regarding the facts contained in this Declaration, unless otherwise stated, and I would, and could, testify competently to them if called to do so in this matter.

3. Epic is incorporated in Wisconsin, and its principal place of business/headquarters is located in Verona, Wisconsin.

4. Epic has been headquartered in or around Madison, Wisconsin since its inception in 1979. Prior to moving to its current campus in Verona, Epic was headquartered in neighboring Madison.

5. As of March 2022, Epic had approximately 9,562 employees in the United States, and approximately 9,497 of those employees work at Epic's headquarters in Verona, Wisconsin.

6. Epic does not have, nor has it ever had, any offices or place of business in Missouri. Epic's only brick-and-mortar locations in the United States are in the Madison, Wisconsin area and Rochester, Minnesota.

7. As of March 16, 2022, Epic had two employees living in Missouri. Epic's general policy is that employees must live within 45 minutes of its Verona, Wisconsin campus, but Employee 1 and Employee 2 were given exceptions to that rule. Employee 1 resides in Ballwin, Missouri (located in the Eastern District of Missouri according to <https://www.uscourts.gov/federal-court-finder/search>) and began working remotely from Missouri in or around July 2017. Employee 1 works in Epic's Implementation division and oversees the implementation of Epic's software applications at customer sites around the country. Employee 2 lives in Columbia, Missouri (located in the Western District of Missouri according to <https://www.uscourts.gov/federal-court-finder/search>) and began working remotely from Missouri on March 7, 2022. Employee 2 works in Epic's Electronic Data Interchange division and focuses on developing and supporting technology for data exchange between Epic software and third-party systems.

8. Neither employee works on licensing third-party content, Epic's cardiology application, or in the development of clinical software. As such, they should not have knowledge relevant to this case.

9. Epic does not own, rent, or lease space for these employees in Missouri. Nor does Epic store any inventory or other materials at these employees' residences.

10. Epic does not maintain a registered agent for service of process in Missouri.

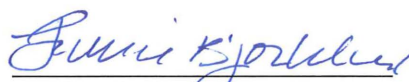
11. Epic's software is designed, developed, programmed, and tested at Epic's campus in Verona, Wisconsin, and in Rochester, Minnesota. Epic employees with knowledge of all aspects of the design, development, and release of Epic's software are located in Wisconsin or Minnesota, as are documents related to same are located in Wisconsin or Minnesota. All of Epic's employees involved in licensing any third-party content for use in its software are also all located in Verona, Wisconsin, as are documents related to same. All of Epic's in-house legal team—and their documents—are also located in Verona, Wisconsin.

12. I understand that no Epic employees with knowledge of information relevant to the allegations in this case reside in Missouri.

13. Epic licenses its electronic health records software to large healthcare organizations including health systems, hospitals and payers located in all 50 states. As of today, there are approximately 550 organizations in Epic's customer community, only 8 of which are headquartered in Missouri.

I DECLARE, under penalty of perjury, that the foregoing is true and correct.

Dated this 22nd day of April, 2022.


Jamie Bjorklund